STATE OF MINNESOTA COUNTY OF CARVER

DISTRICT COURT FIRST JUDICIAL DISTRICT PROBATE DIVISION Case Type: Special Administration

In re:

Estate of Prince Rogers Nelson, Deceased.

Court File No. 10-PR-16-46

NOTICE OF MOTION AND MOTION TO APPROVE PAYMENT OF ATTORNEY'S FEES AND EXPENSES FOR PERIOD NOVEMBER 16, 2016 THROUGH JANUARY 31, 2017

Holland & Knight LLP ("H&K") hereby moves the Court for an order approving payment of certain of Tyka Nelson's attorneys' fees, costs and expenses from the assets of the Estate of Prince Rogers Nelson for services performed by H&K related to the entertainment aspects and general administration of the Estate and which benefitted the Estate as a whole, for the period from November 16, 2016 through January 31, 2017.

The motion is supported by a memorandum of law, affidavits, and arguments of counsel at the time of any hearing, and by the files, records, and proceedings herein. Because the fee request relates to confidential business dealings of the Estate, as well as sensitive matters related to the administration of the Estate, the Court's approval of sealing these unredacted filings is sought. Redacted copies of these filings will be made available for public filing. In addition, because of attorney-client privilege and attorney work product concerns, H&K seeks to lodge its fee statements for *in camera* review only. H&K will make a redacted copy of these fee statements available for public filing.

Respectfully submitted,

Dated: March 3, 2017

HOLLAND & KNIGHT LLP

/s/ Robert Barton Robert Barton, ID No. 0393050

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